

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Adversary Proceeding No. 20-01061-SHL

COÖPERATIEVE RABOBANK U.A., New York
Branch; BROWN BROTHERS HARRIMAN & CO.;
BANK HAPOALIM B.M.; MITSUBISHI
INTERNATIONAL CORPORATION; ICBC
STANDARD BANK PLC; TECHEMET METAL
TRADING, LLC; WOODFOREST NATIONAL
BANK and HAIN CAPITAL INVESTORS
MASTER FUND, LTD.,

Plaintiffs,

vs.

CROWE LLP,

Defendant.

Hon. Sean H. Lane

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Defendant Crowe LLP (“Crowe”), by its undersigned attorneys, respectfully moves for the entry of an order granting it an extension of time until April 15, 2020, to answer or otherwise respond to the Complaint. In support of this motion, Crowe respectfully states as follows:

1. On February 20, 2020, this matter was transferred from the U.S. District Court for the Southern District of Florida to the U.S. District Court to the Southern District of New York pursuant to 28 U.S.C. §1404. *See* Case No. 1:20-cv-01556-LGS, Dkt. 16.
2. On March 17, 2020, this matter was referred to this Court pursuant to 28 U.S.C. § 157(a). *See* Case No. 1:20-cv-01556-LGS, Dkt. 24.
3. The Defendant’s lead counsel was granted leave to appear *pro hac vice* on March

19, 2020. *See* Adversary Proceeding No. 20-01061-SHL, Dkt. 11-15.

4. In light of the COVID-19 pandemic, counsel for the Defendant respectfully requests an extension of time to and including April 15, 2020 to answer or otherwise respond to the Complaint.

5. This requested extension will not cause any unfair prejudice to any party and is not intended to cause any undue delay.

6. Counsel for Crowe has conferred with Andrew Solomon, counsel for the Plaintiffs, concerning this requested extension. Mr. Solomon stated that the Plaintiffs have no objection to this requested extension.

7. A proposed order granting this motion is attached as Exhibit A.

8. Prior to the filing of this motion, one of Crowe's attorneys, John Fitzgerald, called the Courtroom Deputy to request a hearing date but was unable to reach the Courtroom Deputy. Mr. Fitzgerald left a detailed voicemail message for the Courtroom Deputy but has not yet received a response, perhaps due to logistical challenges associated with COVID-19.

WHEREFORE, Defendant Crowe LLP respectfully requests the entry of an order granting it an extension of time until April 15, 2020, to answer or otherwise respond to the Complaint and for any further relief deemed appropriate under the circumstances.

Respectfully submitted,

CROWE LLP

By: /s/ Stuart Kagen
One of its Attorneys

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 20, 2020, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record on the Service List below via transmission of Notice of Electronic Filing generated by CM/ECF.

/s/ Stuart Kagen

Service List	
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